## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA, \*

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Plaintiff,

v. \* CR. NO. 2:06CR155-MHT

\*

QUINTRELL MARTIN,

\*

Defendant.

## AMENDED MOTION TO RECONSIDER DENIAL OF UNOPPOSED MOTION TO CONTINUE BY DEFENDANT

Comes now Defendant Quintrell Martin, through counsel, and amends his previously filed Moton to Reconsider Denial of Unopposed Motion to Continue, because of newly obtained information, as follows:

- 1. Since filing his Moton to Reconsider Denial of Unopposed Motion to Continue, undersigned counsel has been informed that Defendant faces a new capital murder indictment in State Court connected to facts which have been the subject of plea negotiations in this cause.
- 3. Although Defendant believes that a Plea Agreement is in his best interests, all efforts at a Plea Agreement have been with the understanding, by both the defendant and the government, that no State issues existed. Now, any statements, admissions, or pleas may have a significant impact on the State proceeding.
- 4. Counsel has discussed this new development with Verne H. Speirs, A.U.S.A., and both parties agree that additional time is necessary to determine how this prosecution will be impacted and whether a cooperative effort by both the Government and the State can result in a plea agreement.
- 5. In all other respects, Defendant's previous Moton to Reconsider Denial of Unopposed Motion to Continue remains the same.

Respectfully submitted on this the 5th day of October, 2006.

## s/BRUCE MADDOX (MAD013) Attorney for Quintrell Martin

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of the filing to all parties.

s/BRUCE MADDOX